

EXHIBIT 5

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

CHAO CHEN, individually and)	
on behalf of all those)	No. 3:17-cv-05769-RJB
similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE GEO GROUP, INC., a)	
Florida corporation,)	
)	
Defendant.)	

VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
NWAUZOR UGOCHUKWU
June 19, 2018
Fircrest, Washington

Taken Before:

Laura A. Gjuka, CCR #2057
Certified Shorthand Reporter

1 A No.

2 Q -- while you were at Northwest Detention Center?

3 A No.

4 Q When you were at Northwest Detention Center, did anyone
5 talk to you about being a member of this class action
6 that's being filed against The GEO Group?

7 MR. BERGER: I'm going to object and
8 instruct the witness not to answer to the extent that it
9 calls for attorney-client communications between
10 Goodluck and Ms. Mentor.

11 BY MR. DEACON:

12 Q Right. And I'm talking about when you were at Northwest
13 Detention Center. And I don't want to know about
14 communications with your attorney. What I want to know
15 is did any other detainee or anyone else come to you and
16 talk to you about being involved in this class action
17 lawsuit against the GEO Group while you were still at
18 Northwest Detention Center?

19 A Inside the pod? No.

20 Q Yes. No?

21 well, let -- let me ask you -- I don't want to know
22 any communications you had with your attorney -- when
23 was the first time anybody approached you about
24 participating in this lawsuit?

25 A Participate in this lawsuit?

1 Q Yes.

2 MR. BERGER: Just when.

3 THE WITNESS: When?

4 BY MR. DEACON:

5 Q Yeah, just when.

6 A You know, I have friends who also pass through Northwest
7 Detention Center, some Africans. Whenever we hang
8 around, we always -- you know, discussion about the job
9 we did in Northwest Detention Center. And a lot of them
10 did different job. I know a guy from Ghana, he work in
11 kitchen. And also he know some of his friends from his
12 country. I know him, he live the same -- you know, the
13 same apartment with me. We always discussion about it.

14 And one time I heard it on the news. I heard it on
15 the news, commenting about how GEO use people in the
16 detention. I love listening to the radio. The job they
17 are supposed to call people to do, they use the inmate,
18 you know, in that job, you know.

19 Every time, whenever we -- you know, I hang out with
20 all these friends that come through the same place, you
21 know, went through Northwest Detention Center -- we are
22 not happy because the job we did there, we are supposed
23 to pay more than what we are doing.

24 A lot of them -- I know one guy working in kitchen,
25 he explained a lot of these things, the same work. Most

1 of the people work in the kitchen, work more than one
2 hour. Three hours, two hours, depend. More -- every
3 time more than two hours, three hours in kitchen.

4 But my own, I work one hour plus. Then we feel
5 like -- because -- why we cannot say anything? Because
6 we are afraid in that detention. We are afraid. We are
7 hopeless. We are scared. We don't have any right to
8 say. Why you giving us one dollar?

9 But we have to do it. I have to do it so that I will
10 have some money to call my parents. My parents have no
11 more money to send for me. I have to -- they pay me
12 that \$1 to my account, so that I can use it to buy some
13 of the -- some of the -- you know, my need. Commissary,
14 we call it in detention.

15 We can't say anything, but we have to do it to
16 survive. Yeah, been doing it. We did it -- they take
17 advantage of us because they know we cannot say
18 anything. And I have no power to ask them why, because
19 I live with fear in detention.

20 Q Are you done?

21 A Yeah.

22 Q I need to object to your response to my question.

23 My question was: When were you first approached
24 about participating in this litigation?

25 A Okay. Then when I -- when heard what GEO did to

1 Chao Chen? Do you know who Chao Chen is?

2 A (Witness shakes head.)

3 Q The person who first brought this lawsuit, do you know
4 who he is?

5 A Chao Chen?

6 Q Do you know who Chao Chen is?

7 A About this case?

8 Q Yes.

9 A I met my attorney.

10 Q Okay. I'm not asking about meeting your attorney.

11 A Yeah.

12 Q Did you ever meet a detainee or a guy who was a detainee
13 at one time named Chao Chen?

14 A No. This is my first time I've heard that name.

15 Q Okay. Do you know a Fernando Aguirre-Urbina?

16 A That is what I'm telling you, sir. I don't know, this
17 is first time I have heard name.

18 Q All right. How old a man are you? How old are you?

19 A 41.

20 Q 41?

21 A Yeah. Approximately 42.

22 Q You're now 42 or soon to be?

23 A Approximately soon to be 42.

24 Q Oh, soon to be 42. Okay.

25 why did you want to work when you were at Northwest

1 Detention Center?

2 A One --

3 Q why?

4 A -- I have no source of income of getting money, and
5 tried to reach my brother, also get things I want, like
6 commissary. That's why I choose to work.

7 Q Okay. You understand that you were placed at Northwest
8 Detention Center by the United States government while
9 they worked through your asylum?

10 MR. BERGER: Objection, asked and
11 answered.

12 BY MR. DEACON:

13 Q Correct?

14 A I believe.

15 Q Did anyone ever tell you how long it would take for the
16 United States government to go through your asylum case?

17 A (Witness shakes head.)

18 MR. BERGER: I'm going to object to the
19 extent it calls for communications from his attorney.

20 BY MR. DEACON:

21 Q Did you have the same amount of money in your account
22 when you started at Northwest Detention Center as when
23 you left Northwest Detention Center?

24 A Yeah. When I came, I have some money, but I cannot
25 remember.